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September 17, 2010

Ex Parte

Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th Street SW
Washington, DC 20554

Re: ET Docket Nos. 04-186, 02-380 and 10-24; WT Docket Nos. 08-166 and
08-167

Dear Ms. Dortch:

On September 16, 2010, Craig Mundie, Chief Research and Strategy Officer for Microsoft Corp., Dan Reed, Vice President of Technology Strategy and Policy for Microsoft, and Paula Boyd of Microsoft spoke via telephone with Commissioner Baker and her Legal Advisor Charles Mathias regarding the television white spaces proceeding.¹

During this meeting, Microsoft commended the Commission for its work on the white spaces, and for moving forward to establish final white spaces rules at its September meeting. Microsoft highlighted the benefits of unlicensed access to spectrum below 1 GHz through the white spaces, including superior propagation characteristics and range compared with existing Wi-Fi frequencies. Microsoft described its experimental white spaces-based network—known as the “White-Fi” network—which provides wireless broadband connectivity for its Redmond campus, including in fixed and vehicular-mounted environments.

In addition, Microsoft discussed the importance of removing the sensing requirement for geolocation-enabled white space devices, authorizing multiple database providers, reducing the size of “keep out” zones for Part 74 wireless microphones for personal/portable devices, and treating previously unauthorized wireless microphones as Part 15 devices rather than broadcast licensees.

¹ This meeting occurred prior to the release of the Commission’s Sunshine Agenda on Thursday afternoon. See FCC to Hold Open Commission Meeting Thursday September 23, 2010, *Public Notice* (rel. Sep. 16, 2010).

Microsoft also explained that the changes to Mode I white space device operations proposed by the Association for Maximum Service Television were costly and unnecessary, and that any change to the current requirement to check with base stations more than once every 24 hours should reaffirm that this requirement applies only when devices are otherwise transmitting.²

Finally, Microsoft described recent work by Microsoft Research demonstrating that white space devices are capable of operating on the same channel as narrowband wireless microphones without causing harmful interference by avoiding the microphone's location within that channel.

Pursuant to the Commission's rules, a copy of this notice is being filed electronically in the above-referenced dockets. If you require any additional information please contact the undersigned.

Sincerely yours,

/s/ Paula Boyd

Paula Boyd

cc: Commissioner Baker's Office

² See Ex Parte Letter of Dell Inc., Microsoft Corp. and Spectrum Bridge Inc. to Chairman Genachowski, ET Docket Nos. 04-186, 02-380, at 2-3 (filed Sep. 15, 2010); Ex Parte Letter of Dell, Microsoft, and Spectrum Bridge to Chairman Genachowski at 4-5 (filed Sep. 16, 2010).